

# **EXHIBIT “K”**

DOMINGO TORRES FLORES - DECEMBER 7, 2022

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1 speak to any attorneys on Monday about your deposition  
2 today?

3 A No. I didn't. No.

4 Q Did your son talk to any attorneys on Monday  
5 about your deposition today?

6 MR. BEGAKIS: Objection. To the extent  
7 it calls for speculation. Mr. Reporter, just give me --  
8 just wait a beat if you could so I can get my objections  
9 in before. I appreciate it.

10 THE COURT REPORTER: Okay.

11 THE WITNESS: I don't know that. You're  
12 going to have to ask him. My focus is music and that's  
13 it.

14 BY MR. BERMAN:

15 Q What is your relationship, if any, to the band  
16 Los Originales de San Juan?

17 MR. BEGAKIS: Objection. Vague as to  
18 relationship.

19 THE WITNESS: An own -- there's no  
20 relationship.

21 THE INTERPRETER: Sorry.

22 THE WITNESS: I'm an owner, I'm a  
23 partner. I'm a stylist and I designed the style of Los  
24 Originales de San Juan. I'm an owner and no one is  
25 going to take the ownership from me.



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1 THE COURT REPORTER: The time is now 4:35  
2 p.m. and we're off the record. You may proceed.

3 MR. BEGAKIS: I believe Mr. Court  
4 Reporter meant on the record.

5 THE COURT REPORTER: On the record. I'm  
6 sorry. I keep doing that today.

7 MR. BEGAKIS: It's okay. It's all good.  
8 It's all good.

9 EXAMINATION

10 BY MR. BEGAKIS:

11 Q Good afternoon, Mr. Torres.

12 A Good afternoon.

13 Q Mr. Torres, do you consider yourself to be a  
14 co-owner in the band?

15 A Yes.

16 MR. BERMAN: Please note my objection to  
17 form and Ms. Interpreter, I'm also going to ask likewise  
18 that you just pause for a second after -- before  
19 translating the question so I can interpose an  
20 objection.

21 BY MR. BEGAKIS:

22 Q I'm going to ask the question again just for a  
23 clean record. Mr. Torres, do you consider yourself a  
24 co-owner of the band.

25 MR. BERMAN: Objection to form.



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1 MR. LITTLEWOOD: Joined.

2 THE WITNESS: I'm the owner of the group.

3 BY MR. BEGAKIS:

4 Q As an owner of the group, do you believe you  
5 co-owned all of the works that the band created when  
6 they -- when those works were initially created?

7 MR. BERMAN: Objection. Misstates  
8 previous testimony and assumes a fact not in evidence.

9 MR. LITTLEWOOD: Joined.

10 THE WITNESS: Since the very beginning, I  
11 have owned. I've done the arrangement. I own the style  
12 of the band and the productions have been done by me,  
13 all of them.

14 BY MR. BEGAKIS:

15 Q Did you ever sign anything in writing saying  
16 that you didn't own any of the works the band has ever  
17 created?

18 MR. BERMAN: Objection to form.

19 MR. LITTLEWOOD: Joined.

20 MR. BEGAKIS: Sounds like a parrot to me.

21 MR. LITTLEWOOD: John, you know what, you  
22 can stop it. You are the most unprofessional attorney  
23 I've ever run across. You can just stop it. I can't  
24 believe you even made a comment like that in front of  
25 the Judge. You should be embarrassed. She takes notes



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1 of those things, and you're going to find yourself in  
2 some pretty difficult positions if you keep this up.

3 MR. BEGAKIS: Are you finished?

4 MR. LITTLEWOOD: Are you finished calling  
5 me a parrot?

6 MR. BEGAKIS: I asked you a question.

7 MR. LITTLEWOOD: I am finished as long as  
8 you stop being an obstructive jerk, and you just focus  
9 on the matter at hand. I don't need your colloquy or  
10 your commentary on my objection.

11 MR. BEGAKIS: Likewise, Counsel.

12 MR. LITTLEWOOD: Have I been making a  
13 colloquy or commentary on your objections? Calling me a  
14 parrot --what kind of objection. You unprofessional --

15 MR. BEGAKIS: This is exactly what that  
16 is. This is exactly what that is.

17 MR. LITTLEWOOD: You are unprofessional,  
18 an embarrassment to our profession.

19 MR. BEGAKIS: This is exactly what that  
20 is.

21 MR. LITTLEWOOD: Do you have any F bombs  
22 that you want to drop?

23 MR. BEGAKIS: I don't know. Do you?

24 MR. LITTLEWOOD: You're the one that  
25 likes to use them freely.



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1 MR. BEGAKIS: Okay, Counsel.

2 THE WITNESS: No, never.

3 THE INTERPRETER: Sorry, I couldn't  
4 understand the last part. I'm going to ask.

5 THE WITNESS: Ask me again?

6 BY MR. BEGAKIS:

7 Q Did you ever sign anything in writing saying  
8 that you didn't jointly own any of the works the band  
9 has ever created?

10 MR. BERMAN: Objection.

11 MR. LITTLEWOOD: Objection. Lacks  
12 foundation. Calls for speculation. Vague and  
13 ambiguous. Irrelevant. Not reasonably calculated to  
14 lead the discovery of admissible evidence.

15 MR. BEGAKIS: Irrelevant? Okay.

16 MR. BERMAN: Joined.

17 MR. LITTLEWOOD: Signing something that  
18 he didn't give away, that he never had? Okay. Good  
19 luck (indiscernible - simultaneous speech) on that,  
20 buddy.

21 MR. BEGAKIS: Okay. Okay. Mr.  
22 Littlewood.

23 THE INTERPRETER: The answer is no.

24 BY MR. BEGAKIS:

25 Q As a co-owner, do you believe you were



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1 entitled to an equal share of any profits that the band  
2 generated?

3 MR. BERMAN: Objection. Sorry.

4 Objection based on mischaracterization of testimony and  
5 based on facts not in evidence.

6 MR. LITTLEWOOD: Lacks foundation. Calls  
7 for speculation.

8 MR. BERMAN: I join those objections as  
9 well.

10 THE WITNESS: Yes. I'm a partner. I'm  
11 an owner.

12 BY MR. BEGAKIS:

13 Q As a partner and an owner, how were band  
14 decisions supposed to be made?

15 MR. LITTLEWOOD: Objection. Lacks  
16 foundation. Calls for speculation. Assumes facts not  
17 in evidence.

18 MR. BERMAN: Joined.

19 MR. LITTLEWOOD: Calls for legal  
20 conclusion. Also compound.

21 THE WITNESS: We make them together.

22 BY MR. BEGAKIS:

23 Q Did all of the members of the band agree to  
24 enter into an agreement with Hyphy Music for Hyphy Music  
25 to acquire the works at issue in this case?



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